

EPA Region 10  
Deemed Releasable

# Request 101



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Javier  
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Terms of Reference  
for RMP/PSM  
Compliance audit 2014



	Shell Oil Products - United States of America
Location(s)	Puget Sound Refinery
Audit Type	OSHA Process Safety Management of Highly Hazardous Chemicals (PSM) and EPA Risk Management Program (RMP)
Audit Sponsor	Farid, Aamir SDIUS-DMW
Auditee	Rizzo, Tom J SOPUS-DMW/ Site GM
Auditee Liaison	Filby, Adam S SOPUS-DMW/465
Audit Coordinator	Filby, Adam S SOPUS-DMW/465
Lead Auditor	Crighton, Douglas SCANUAS/S/A
	Lewis, Meredith L SOPUS-DMW/336
	Misa, Noel SOPUS-DMH/C
Observer	N/A
Audit Number	2014 – 8
Start Date	05-12-2014
End Date	05-16-2014

### 1.1 Scope

The scope of the audit is the Shell Oil Products Puget Sound Refinery. The audit will occur between 05-12-2014 and 05-16-2014

### 1.2 Objectives

The objective of this audit is to conduct a compliance audit consistent with the federal OSHA Process Safety Management of Highly Hazardous Chemicals (PSM) Standard and EPA Risk Management Program regulations, as applicable to the facility.

### 1.3 Standards

The audit will be carried out against the following:

- Compliance to Regulations and Standards:
  - Laws and regulations of the United States
    - Process Safety Management
      - 29 CFR 1910.119, Process Safety Management of Highly Hazardous Chemicals
    - Risk Management Program
      - 40 CFR Part 68, Chapter I, Subchapter C, Accidental Release Prevention Requirements: Risk Management Program Requirements Under Clean Air Act Section 112(r) (RMP)
  - Puget Sound Refinery business unit/facility specific standards and procedures related to compliance with the OSHA PSM Standard and EPA Risk Management Program regulations; as applicable.

### 1.4 Auditee and Sponsor

The sponsor is Farid, Aamir SDIUS-DMW

The auditee is Rizzo, Tom J SOPUS-DMW/ Site GM

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### 1.5 Team Composition

The audit team will consist of four members

Crighton, Douglas SCAN-UAS/S/A – HSE-SD DS Assurance Coordinator
Lewis, Meredith L SOPUS-DMW/336 - Staff Engineer - Martinez
Misa, Noel SOPUS-DMH/C - Process Safety Manager - Americas

### 1.6 Pre - Audit Preparation

The auditee is to complete the following activities prior to the audit:

- Review these Terms of Reference (ToR), including applicability of the PSM standards in advance of the audit, revise if appropriate, then agree by return email to the terms
- Distribute the agreed ToR to the designated audit liaison, audit coordinator and others, as appropriate
- Assign a site audit coordinator to support the audit team, handle logistics and address audit requests

### 1.7 Methodology

The methodology will be to:

- Review the facility procedures and documents related to the subject compliance areas
- Visit a selection of plant worksites
- Interview a cross-section of staff and contractors

The facility will assign a site audit coordinator to act as liaison to the audit team. The lead auditor and the site audit coordinator will define an interview schedule approximately three weeks prior to the scheduled review.

The audit coordinator/liaison will provide documentation required by regulations or by Company policy as requested in pre-audit preparations or have it readily available (an original document/record provided to the auditor immediately or within 1 day).

During the audit, ad hoc meetings between the audit team and the site audit coordinator are conducted to discuss audit observations, as necessary.

Towards the end of each day (not including last day of the audit), at least one representative from the facility (auditee/delegate) and the lead auditor will debrief on progress of the audit. The debriefing will alert the auditee/delegate of potential findings or emerging issues.

To facilitate field audit activities, the following items are to be provided:

- Site safety briefing for the audit team on the morning of arrival at the location
- A short meeting to orient the audit team to the site HSSE policies, procedures and systems for compliance to be delivered as part of the opening meeting
- Auditee or delegate to present a facility overview and operations summary at opening meeting
- The facility will identify a facility subject matter expert (SME) or focal point for the facility's PSM and RMP work processes. (liaison or delegate)

### Schedule

The audit schedule will be as follows:

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Date	Location	Activities
05-11-2014	Puget Sound	Audit team members arrive Puget Sound
05-12-2014	8505 S Texas Ave Anacortes, WA 98221	Site Safety Orientation, Opening meeting, data collection (interviews, records review, windshield tour, field walks, daily debriefing)
05-12-2014	8505 S Texas Ave Anacortes, WA 98221	Data collection (interviews, records review, field walks, daily debriefing)
05-14-2014	8505 S Texas Ave Anacortes, WA 98221	Data collection (interviews, records review, field walks, daily debriefing) Final day of data collection.
05-15-2014	8505 S Texas Ave Anacortes, WA 98221	Report writing, summary management review w/ auditee
05-15 (or 16)-2014	8505 S Texas Ave Anacortes, WA 98221	Closing meeting and team departure

### 1.8 Audit Report

Findings will be provided in the audit report and will contain the following elements:

- Finding Number
- Finding Statement
- Observations
- Requirement Reference

A presentation of the audit findings will be made to the auditee prior to departure of the audit team. The auditee is responsible for determining the attendance at the closing meeting. The Lead auditor will prepare the draft audit report and obtain legal review.

Within ten (10) business days of the audit closing meeting, the lead auditor shall send a copy of the draft audit report to the auditee. The auditee will have ten (10) business days from the distribution date to provide comments concerning the proposed findings documented in the draft report.<sup>1</sup> The lead auditor will review the comments and will request clarification if required to obtain concurrence on the proposed finding, as applicable.

If agreement cannot be reached between the lead auditor and the auditee, the lead auditor, auditee, the US HSE assurance manager, business HSE manager, and legal, as applicable, will discuss and agree to a forward plan to resolve the issue. If resolution is not achieved at this meeting, the lead auditor has final approval for the report.

### Report Distribution

The final report will be sent by the lead auditor to the auditee. The final report will be electronically distributed to:

Audit Sponsor	Farid, Aamir SDIUS-DMW
Auditee	Rizzo, Tom J SOPUS-DMW/ Site GM
Regional Process Safety Manager	Misa, Noel SOPUS-DMH/C
Site Process Technology Manager	Roberson, Michelle L SOPUS-DMW/46

<sup>1</sup> If additional time is needed by the auditee to complete review of the draft audit report, please contact the lead auditor.



Site HSSE Manager	Yeo, Chet E SOPUS-DMW/43
Site PSM Manager	Williams, Stephen P SOPUS-DMW/465
US-UA Assurance Manager	Galloway, Doyle R SEPSCO-UAS/S/A
Business Assurance Coordinator	Filby, Adam S SOPUS-DMW/465

### 1.9 Audit Follow Up

The final report received by the auditee represents the official report of the audit findings. The auditee is responsible for completion of the certification statement that is required by the OSHA PSM Standard, as applicable.

The auditee shall prepare an Action Plan (AP) for all findings within (14) business days of the date of the final report. The AP for these findings will be entered in Fountain Assurance by the site designate, tracked and owned by the auditee and further actioned and reported according to the Downstream process and documented to satisfy regulatory requirements, as applicable. A copy of the AP is to be sent to the lead auditor and is to contain the following: Finding number, Status (Open or Closed), a Description of how the finding was resolved/closed, and the date closed.

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